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CLERK OF COURT  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

7  
8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF PUERTO RICO**

10 In re:

11 THE FINANCIAL OVERSIGHT AND  
12 MANAGEMENT BOARD FOR PUERTO  
13 RICO,

14 as representative of,

15 THE COMMONWEALTH OF PUERTO  
16 RICO, *et al.*,

17 Debtors<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the PROOF OF  
CLAIM No. 126600 against the  
Commonwealth.**

18 **RESPONSE TO ONE HUNDRED TWENTY-FOURTH OMNIBUS OBJECTION**  
19 **(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO,**  
20 **PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND**  
21 **EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE**  
22 **COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS ASSERTING**  
23 **INTERESTS BASED ON SALARY DEMANDS,**  
24 **EMPLOYMENT OR SERVICE PROVIDED**

25 **TO THE HONORABLE COURT:**

26 **COMES NOW,** Janette R. Bonilla Rodríguez, responding claimant and party-in-interest  
27 as to the Commonwealth of Puerto Rico, pro se, and very respectfully states and prays:

28 <sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474).

1. The undersigned, a party-in-interest in the above captioned case, has filed a Proof of Claim dated June 28, 2018, Case Number 17 BK 03283-LTS, against the Commonwealth of Puerto Rico, Claim Number 126600, in the amount of \$17,010.00, based on salary demands. This amount is approximate; hence it could result to be a greater amount.
2. The Commonwealth of Puerto Rico filed the Omnibus Objection alleging the Proof of Claim is deficient due to failing to provide information necessary for the Debtor to determine whether the claim is valid.

#### **Reasons for Opposing the Omnibus Objection**

The claimant opposes the Omnibus Objection for the reasons exposed as follows:

1. According to declaration of Jay Herriman, Managing Director of A&M (Exhibit B of the Omnibus Objection), a letter was sent to each of the claimants who filed Deficient Claims requesting additional information and supporting documentation, but the undersigned never received said notification.
2. The undersigned, herein the Responding Claimant, is employee of the Commonwealth of Puerto Rico, specifically working for the Department of Education as an English teacher since 2006 to the present (**Exhibit 1**), activated to the *Carrera Magisterial* since 2013 (**Exhibit 2**), and obtained a Master of Education in 2015, conferred by Universidad del Turabo (**Exhibit 3**).
3. The claim against the Commonwealth of Puerto Rico is in regard to salary due by the Department of Education to the claimant, on the basis of Law 158, known as the *Ley de la Carrera Magisterial* (The Teaching Profession) of 1999. Also, on the basis of Law 109 of 2008, known as *Ley de aumento del salario básico a los maestros*.

- 1           4. In the case of the *Carrera Magisterial*, the Department of Education paid only the  
2           activation to this system in 2013 (\$122.50) (**Exhibit 2**), but in accordance to Law 66  
3           of 2014, revisions of salaries were frozen and claimant did not receive the wage  
4           increase to the reason of \$87.50 to the basic monthly salary per each year for 5 years  
5           to a total sum of \$595.00, and the amount stated in the Proof of Claim was based on  
6           an approximated calculation of the salaries earned but unpaid to the amount of  
7           approximately \$17,010.00 (**Exhibit 4**).  
8
- 9           5. In terms of Law 109 of 2008, the same establishes that “any person who is currently  
10          occupying the position of the teacher will be granted an increase of one hundred and  
11          fifty (150) dollars per month from the 1st. July 2008.” However, to the best of her  
12          knowledge, information, and belief, the claimant did not receive such increase of  
13          salary. Calculating said monthly amount of \$150.00 to the year 2019, it is a total  
14          amount of approximately \$19,800.00 (**Exhibit 5**). Because this amount was  
15          undetermined at the date of the filing the Proof of Claim, it was included in the  
16          approximate amount established in the Proof of Claim, which amount could be a  
17          greater amount.  
18
- 19          6. Hereby the claimant attach the requested supporting documentation, evidence, and  
20          additional information to the claim, and requests for the Court to disallow the  
21          objection to the Proof of Claim number 126600 against the Commonwealth of  
22          Puerto Rico , and deem the claim as valid and allowed.  
23  
24

25           **WHEREFORE**, it is respectfully requested from this Honorable Court that the Omnibus  
26    Objection being not granted with respect to my claim, to accept the supporting documentation,  
27  
28

evidence and additional information to Proof of Claim number 126600 against the Commonwealth of Puerto Rico, and deem it as valid and allowed.

**CERTIFICATE OF SERVICE:** I hereby certificate that I will file and serve this document through the U.S. mail to the Clerk's Office, United States District Court, the Oversight Board, and the Creditors' Committee at the following addresses: Clerk's Office, United States District Court, Room 150 Federal Building, San Juan, Puerto Rico 00918-1767 (Certified Mail #7019 1640 0002 1434 0202); Counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036-8299 (Certified Mail #7019 1640 0002 1434 0219); Counsel for the Creditors' Committee, Paul Hastings LLP, 200 Park Avenue, New York, New York 10166, Attn. Luc A. Despins, James Bliss, James Worthington, and G. Alexander Bongartz (Certified Mail #7019 1640 0002 1434 0226).

**RESPECTFULLY SUBMITTED,**

In Guayama, Puerto Rico, on this 7<sup>th</sup> day of February of 2020.



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